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October 13, 2022

VIA ECF

Special Master
Hon. Thomas Vanaskie
Stevens & Lee
1500 Market Street, East Tower
18th Floor
Philadelphia, PA 19103
TIV@stevenslee.com

RE: *In re Valsartan, Losartan, and Irbesartan Products Liability Litigation*, No. 1:19-md-2875-RBK-KMW (D.N.J.)

Dear Special Master Vanaskie:

I write on behalf of Defendants Zhejiang Huahai Pharmaceutical Co, Ltd.; Huahai U.S., Inc.; PrincetonPharmaceutical Inc.; and Solco Healthcare US, LLC (collectively, “ZHP”) to follow up on the September 8, 2022 hearing regarding plaintiffs’ Motion for Rule 37 Sanctions.

At that hearing, you indicated that ZHP had not submitted an affidavit or declaration explaining the nature of Chinese government procedures with respect to the evaluation of requests for permits to travel, like the one submitted by Mr. Chen Baohua. (*See, e.g.*, Hr’g Tr. 41:3-42:11, Sept. 8, 2022.) In response, we retained Jacques deLisle, the Stephen A. Cozen Professor of Law, Professor of Political Science, Director of the Center for the Study of Contemporary China, and Co-Director of the Center for Asian Law at the University of Pennsylvania (full CV attached as Ex. 1), to prepare a declaration explaining the context surrounding the denial of Mr. Baohua’s request to travel to Macau for a deposition in this matter. Professor deLisle’s declaration (attached as Ex. 2) confirms that Mr. Baohua applied in good faith for permission to travel and thus demonstrates why the sanctions sought by plaintiffs would not be appropriate.

Special Master the Honorable Thomas Vanaskie
October 13, 2022

We hope you will consider the attached submission, and please let us know if you would like copies of any of the materials cited in the declaration.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Bernardo", with a long horizontal flourish extending to the right.

Richard T. Bernardo

cc: All counsel of record (via ECF)